

HONORABLE JUSTIN L. QUACKENBUSH

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

PLUMBERS UNION LOCAL NO. 12
PENSION FUND, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

AMBASSADORS GROUP, INC., et al.

Defendants.

No. CV-09-00214-JLQ

CLASS ACTION

MEMORANDUM IN SUPPORT OF
MOTION FOR LIMITED ADMISSION
OF SAMUEL H. RUDMAN *PRO HAC*
VICE AS COUNSEL FOR PLAINTIFF

1 Pursuant to Local Rule 83.2(c) of the United States District Court for the Eastern
2 District of Washington, plaintiff, through their designated local counsel of Lovell
3 Mitchell & Barth, LLP, applicant Samuel H. Rudman respectfully moves this Court for
4 an order granting his admission *Pro Hac Vice* in the instant action, with the
5 corresponding right to appear, participate and be heard on matters pertaining thereto.
6 Accompanying this Memorandum is the sworn declaration of Samuel H. Rudman
7 establishing all requirements of admission:

8 Mr. Rudman's full business address and contact numbers:

9 **COUGHLIN STOIA GELLER RUDMAN & ROBBINS, LLP**
10 58 South Service Road, Suite 200
11 Melville, NY 11747
12 Tel.: 631/367-7100
13 Fax: 631/367-1173

14 The dates of Mr. Rudman's admission to practice before other courts:

15 *See* Declaration of Samuel H. Rudman in Support of his Motion for Limited Admission
16 as *Pro Hac Vice* as Counsel for Plaintiff.

17 The contact information for the admitted counsel with whom Mr. Rudman will
18 be associated:

19 Karl P. Barth, WSBA #22780
20 **LOVELL MITCHELL & BARTH, LLP**
21 911 Western AVE, Suite 308
22 Seattle, WA 98104
23 Tel.: 206/432-8330
Fax: 206/432-8331

In satisfaction of Local Rule 83.2(c)(1), the application fee of \$150.00 shall be
forthwith submitted to the Clerk of the United States District Court for the Eastern
District of Washington.

1 Respectfully submitted this 22nd day of September, 2009 by:

2 **LOVELL MITCHELL & BARTH, LLP**

3 By: 

4 Karl P. Barth, WSBA #22780

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6 Seattle, WA 98104

7 Tel.: 206/432-8330

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9 ***[Proposed] Liaison Counsel for Plaintiff***

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17 **COUGHLIN STOIA GELLER RUDMAN &**
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[Proposed] Lead Counsel for Plaintiff

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Additional Counsel for Plaintiff